## **EXHIBIT 2**

# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION	) ) ) )
THIS DOCUMENT RELATES TO:	) MDL No. 2419 ) Dkt. No 1:13-md-2419 (RWZ)
All Suits Against the Saint Thomas Entities	) )
	)
	)

# SAINT THOMAS ENTITIES' NOTICE OF TAKING VIDEOTAPED DEPOSITION OF ANNETTE ROBINSON

The Saint Thomas Entities, <sup>1</sup> pursuant to Federal Rule of Civil Procedure 30, come now and give notice that the oral and videotaped deposition of Annette Robinson will be taken on December 16, 2015, beginning at 12:30 local time and continuing until completed. The deposition will take place at Nutter McClennen & Fish, LLP, 155 Seaport Boulevard, Boston, MA, 02210. The deposition will be recorded by stenographical means and by video.

Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

Dated: December 3, 2015

SAINT THOMAS HEALTH, SAINT THOMAS NETWORK, and SAINT THOMAS WEST HOSPITAL

By their attorneys,

/s/ Sarah P. Kelly
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<sup>\*</sup>Appearing Pro Hac Vice

### **CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 3rd day of December, 2015.

/s/ Sarah	Kelly	
Sarah P.	Kelly	

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